

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ARY JEWELERS, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 04-10281-EFH
	)	
IBJTC BUSINESS CREDIT CORPORATION	)	
and DAVID MOLINARIO,	)	
	)	
Defendants.	)	
	)	

**JOINT MOTION FOR AN EXTENSION OF  
TIME AND FOR LEAVE TO FILE A REPLY BRIEF**

Plaintiff ARY Jewelers, LLC ("ARY") and Defendants IBJTC Business Credit Corporation and David Molinario (collectively, "Defendants"), respectfully submit this Joint Motion for an Extension of Time and for Leave to File a Reply Brief.

The Parties respectfully move for an extension of time for ARY to file its papers in opposition to Defendants' Motion for Summary Judgment from August 25, 2005 until September 15, 2005. The Parties further request that the Court grant Defendants leave to file a brief in reply to ARY's opposition, and that such reply papers be filed with the Court on or before September 29, 2005. The Parties agree that they each shall serve their respective papers so that they are received by the opposing Party prior to the close of business on the date specified for filing with the Court.

Finally, the Parties request that the Court extend the deadline for completion of all expert disclosure from September 11, 2005 until ninety days after the entry by the Court of its order adjudicating the Motion. Inasmuch as the Motion seeks dismissal of the action in its entirety,

the Parties agree that an extension of the deadline as outlined above would be in the interest of judicial economy, and could potentially avoid unnecessary expense by the Parties.

ARY JEWELERS, LLC  
By its attorneys,

/s/ Stephen P. Carrigan  
Stephen P. Carrigan  
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Dated: August 23, 2005

IBJTC BUSINESS CREDIT CORPORATION  
and DAVID MOLINARIO,  
By their attorneys,

/s/ Kate Cimini  
Kate Cimini (BBO No. 654336)  
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Dated: August 23, 2005